

Solomon M. Radner, Esq. (NJ SBN 283502018)

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

Yeong Wan Cho (a.k.a. Peter Cho); Abdul
Gaffar; Sei Young Yun; Salvacion USA,
Inc.; Salvacion International, LLC; Salvacion
Co., Ltd.; Salvacion R&D Center; Biosure
Global, Ltd.; Immobiliaria La Salvacion,
R.D.; John and Jane Does 1 through 10
(gender neutral fictitious names); ABC
Corporation 1 through 10 (fictitious names),

Defendants.

Civil Action No.: 2:23-cv-3709

**PLAINTIFF'S UNOPPOSED
MOTION FOR EXTENSION
OF TIME TO SERVE
DEFENDANTS**

Document Electronically Filed

Plaintiff, TRUTEK CORP., by and through its attorneys, hereby respectfully
moves the Court for an extension of the current deadline for service of process of

the Summons and Complaint applicable under Rule 4 of the Federal Rules of Civil Procedure. In support thereof, Plaintiff states the following:

1. Plaintiff filed their Complaint on July 11, 2023. (ECF 1).
2. At this time, Plaintiff has not yet served all Defendants with the Complaint and Summons as required.
3. Lead counsel for Plaintiff seeks additional time to serve process on certain Defendants.
4. Defendants are located in Korea and require translation of all documents relevant to proper service.
5. The current deadline to serve Defendants with the Complaint and Summons is October 9, 2023. Plaintiff requests an extension of 120 days (to and including February 6, 2023) in order to fully translate documents and exhibits in preparation of international service of process and to serve the international Defendants.
6. Plaintiff has not moved for or obtained any similar extensions of time.
7. Plaintiff has made extensive good faith efforts to communicate with other counsel in order to timely and cost effectively serve the many Defendants in this case.

8. Counsel for Plaintiff has sought concurrence of this Motion from counsel for the Defendants who have Appearances on file. Defendants counsel have expressed they will not oppose this motion.

9. This request is not filed for the purpose of delay; no party will be prejudiced by the granting of this motion.

Plaintiff respectfully requests that the Court approve the foregoing Motion for Extension of Time to Serve Defendants.

Date: October 6, 2023

Respectfully Submitted,

/s/ Solomon Radner

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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2023, I served the foregoing document upon all parties by filing this document on this court's CM/ECF electronic filing system which will send a true copy to all counsel of record.

/s/ Solomon M. Radner
Attorney for Plaintiffs